

UNITED STATES DEPARTMENT OF JUSTICE  
WASHINGTON, D.C. 20530

SUPPLEMENTAL STATEMENT

*Pursuant to Section 2 of the Foreign Agents  
Registration Act of 1938, as Amended*

For Six Month Period Ending 04 DEC 1980  
(Insert date)

Name of Registrant

Registration No.

ARNOLD & PORTER

1750

Business Address of Registrant

1200 New Hampshire Avenue, N.W.  
Washington, D. C. 20036

I - REGISTRANT

1. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual: N.A.

|                       |                              |                             |
|-----------------------|------------------------------|-----------------------------|
| (1) Residence address | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (2) Citizenship       | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (3) Occupation        | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

(b) If an organization:

|                          |   |  |
|--------------------------|---|--|
| (1) Name                 | Yes <input type="checkbox"/>            | No <input checked="" type="checkbox"/> |
| (2) Ownership or control | Yes <input type="checkbox"/>            | No <input checked="" type="checkbox"/> |
| (3) Branch offices       | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/>            |

2. Explain fully all changes, if any, indicated in Item 1.

The Registrant has moved its branch office in Denver, Colorado to 1660 Lincoln Street, Denver, Colorado 80264.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5.

3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name

Position

Date Connection  
Ended

4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period? ☒ Yes No ☐

If yes, furnish the following information:

| Name         | Residence<br>Address                         | Citizenship | Position | Date<br>Assumed |
|--------------|--|-------------|----------|-----------------|
| Michael Sohn | 6860 Florida Street<br>Chevy Chase, Maryland | U.S.A.      | Partner  | July 1, 1980    |

5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal? Yes ☐ No ☒

If yes, identify each such person and describe his services.

6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish the following information:

| Name               | Position or connection | Date terminated |
|--------------------|------------------------|-----------------|
| Paul C. Besozzi    | Associate              | August 17, 1980 |
| Ronald B. Ravikoff | Associate              | August 8, 1980  |

The following person ceased rendering services to foreign principals during this period:

|                 |         |              |
|-----------------|---------|--------------|
| Daniel M. Lewis | Partner | June 5, 1980 |
|-----------------|---------|--------------|

7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity? Yes ☒ No ☐

If yes, furnish the following information:

| Name | Residence<br>Address | Position or<br>connection | Date connection<br>began |
|------|----------------------|---------------------------|--------------------------|
|------|----------------------|---------------------------|--------------------------|

See Attachment No. 1

## II - FOREIGN PRINCIPAL

8. Has your connection with any foreign principal ended during this 6 month reporting period?

Yes ☒ No ☐

If yes, furnish the following information:

*Name of foreign principal*

Government of the Republic of Panama

Swiss Cheese Union, Inc.

Switzerland Gruyere Processed Cheese Manufacturers

Association

Government of Nicaragua

*Date of Termination*

6/20/80

8/29/80

8/29/80

11/25/80\*/

9. Have you acquired any new foreign principal<sup>1</sup> during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish following information:

*Name and address of foreign principal*

*Date acquired*

See Attachment No. 2

10. In addition to those named in Items 8 and 9, if any, list the foreign principals<sup>1</sup> whom you continued to represent during the 6 month reporting period.

See Attachment No. 3

## III - ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services:

See Attachment No. 4

<sup>1</sup> The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

\*/ After November 25, 1980, although the Registrant's connection with this foreign principal has not been terminated, such connection is limited to activities exempt from registration under Section 3 of the Act.

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity<sup>2</sup> as defined below?

Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

See Attachment No. 5

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13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals?

Yes ☐ No ☒

If yes, describe fully.

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<sup>2</sup> The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

# IV - FINANCIAL INFORMATION

## 14. (a) RECEIPTS - MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise?

Yes ☒ No ☐

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.<sup>3</sup>

| <i>Date</i> | <i>From Whom</i> | <i>Purpose</i> | <i>Amount</i> |
|-------------|------------------|----------------|---------------|
|-------------|------------------|----------------|---------------|

See Attachment No. 6

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Total

## 14. (b) RECEIPTS - THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value<sup>4</sup> other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal?

Yes ☐ No ☒

If yes, furnish the following information:

| <i>Name of<br/>foreign principal</i> | <i>Date<br/>received</i> | <i>Description of<br/>thing of value</i> | <i>Purpose</i> |
|--------------------------------------|--------------------------|--|----------------|
|--------------------------------------|--------------------------|--|----------------|

<sup>3</sup> A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(e).

<sup>4</sup> Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) DISBURSEMENTS - MONIES

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement?    Yes ☒    No ☐

(2) transmitted monies to any such foreign principal?    Yes ☐    No ☒

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

| Date | To Whom | Purpose | Amount |
|------|---------|---------|--------|
|------|---------|---------|--------|

See Attachment No. 7

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Total

15. (b) DISBURSEMENTS - THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value<sup>5</sup> other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

| <i>Date disposed</i> | <i>Name of person to whom given</i> | <i>On behalf of what foreign principal</i> | <i>Description of thing of value</i> | <i>Purpose</i> |
|----------------------|-------------------------------------|--|--------------------------------------|----------------|
|----------------------|-------------------------------------|--|--------------------------------------|----------------|

(c) DISBURSEMENTS - POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value<sup>5</sup> in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office? Yes ☐ No ☒ \*/

If yes, furnish the following information:

| <i>Date</i> | <i>Amount or thing of value</i> | <i>Name of political organization</i> | <i>Name of candidate</i> |
|-------------|---------------------------------|---------------------------------------|--------------------------|
|-------------|---------------------------------|---------------------------------------|--------------------------|

\*/ See Attachment No. 8

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V - POLITICAL PROPAGANDA

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes ☒ No ☐

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal.

Dutch Employers' Federation; Corporation for Economic Development  
H.I. Limited; Manos del Uruguay

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<sup>5</sup> Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda?  
Yes ☐ No ☒

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of political propaganda include the use of any of the following:

☐ Radio or TV broadcasts ☐ Magazine or newspaper ☐ Motion picture films ☒ Letters or telegrams  
articles  
☐ Advertising campaigns ☐ Press releases ☐ Pamphlets or other ☐ Lectures or  
publications speeches

☒ Other (specify) Congressional testimony; memorandum

20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propaganda among any of the following groups:

☒ Public Officials ☐ Newspapers ☐ Libraries  
☐ Legislators ☐ Editors ☐ Educational institutions  
☐ Government agencies ☐ Civic groups or associations ☐ Nationality groups  
☐ Other (Specify) \_\_\_\_\_

21. What language was used in this political propaganda:

☒ English ☐ Other (specify) \_\_\_\_\_

22. Did you file with the Registration Section, Department of Justice, two copies of each item of political propaganda material disseminated or caused to be disseminated during this 6 month reporting period?

Yes ☒ No ☐

23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act? Yes ☒ No ☐

24. Did you file with the Registration Section, Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act?

Yes ☒ No ☐

## VI - EXHIBITS AND ATTACHMENTS

### 25. EXHIBITS A AND B

- (a) Have you filed for each of the newly acquired foreign principals in Item 9 the following:

Exhibit A<sup>6</sup> Yes ☒ No ☐

Exhibit B<sup>7</sup> Yes ☒ No ☐

If no, please attach the required exhibit.

- (a) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period?

Yes ☐ No ☒

If yes, have you filed an amendment to these exhibits? Yes ☐ No ☐ N.A.

If no, please attach the required amendment.

<sup>6</sup> The Exhibit A, which is filed on Form OBD-67 (Formerly DJ-306) sets forth the information required to be disclosed concerning each foreign principal.

<sup>7</sup> The Exhibit B, which is filed on Form OBD-65 (Formerly DJ-304) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.



26. EXHIBIT C

If you have previously filed an Exhibit C<sup>8</sup>, state whether any changes therein have occurred during this 6 month reporting period.

Yes ☐ No ☐ N.A.

If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐ N.A.

If no, please attach the required amendment.

27. SHORT FORM REGISTRATION STATEMENT

Have short form registration statements, been filed by all of the persons named in Items 5 and 7 of the supplemental statement?

Yes ☒ No ☐

If no, list names of persons who have not filed the required statement.

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration statement and the attached exhibits and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) his (their) personal knowledge.

(Type or print name under each signature)

(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

Brooksley E. Landau  
Brooksley E. Landau  
W. Rogers  
William D. Rogers

Subscribed and sworn to before me at

Washington, D.C.

this

5

day of

January

, 19

81

Patricia H. Davis  
(Signature of notary or other officer)

My Commission Expires October 31, 1984

<sup>8</sup> The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause shown upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, Department of Justice, Washington, D.C. 20530.

ATTACHMENT NO. 1

7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity?

Yes   X   No       

If yes, furnish the following information:

| <u>Name</u>             | <u>Residence Address</u>   | <u>Position or Connection</u> | <u>Date Connection Began</u> |
|-------------------------|--|-------------------------------|------------------------------|
| Marc D. Guren           | 3110 Wisconsin Ave., N.W.<br>Apt. 303<br>Washington, D. C. 20016 | Associate                     | 9/8/80                       |
| Kathleen Clubb Kauffman | 9200 Bradford Road<br>Silver Spring, Md. 20910                   | Associate                     | 9/2/80                       |
| Nils Pettersen-Hagh     | 1609 Ripon Place<br>Alexandria, Virginia 22302                   | Foreign Associate             | 9/1/80                       |
| Louise J. Richard       | 2805 Q Street, N.W.<br>Washington, D. C. 20007                   | Foreign Associate             | 9/1/80                       |

In addition, the following persons, hired previously, began to render services relating to foreign principals during this period:

|                      |  |               |         |
|----------------------|--|---------------|---------|
| Minda S. Frahm       | 5817 Tanglewood Drive<br>Bethesda, Md. 20034             | Associate     | 9/29/77 |
| Lauralee A. Matthews | 5309 Burling Terrace<br>Bethesda, Md. 20014              | Associate     | 5/7/80  |
| Mark L. Pelesh       | 1001 Wilson Blvd., #802<br>Arlington, Va. 22209          | Associate     | 9/5/78  |
| Richard Forrest Orr  | 1300 Army Navy Drive<br>Apt. 507<br>Arlington, Va. 22202 | Associate     | 9/14/78 |
| Jeffrey A. Meyers    | 1920 Columbia Pike<br>Arlington, Va.                     | Law Assistant | 10/5/77 |
| Lawrence E. Wzorek   | 5503 Margate Street<br>Springfield, Va. 22151            | Associate     | 10/3/77 |

ATTACHMENT NO. 2

9. Have you acquired any new foreign principals during this 6 month reporting period?

Yes   X   No       

If yes, furnish following information:

| <u>Name and address of foreign principal</u>   | <u>Date Acquired</u>        |
|--|-----------------------------|
| Government of Spain<br>Embassy of Spain<br>2700 15th Street, N.W.<br>Washington, D. C. 20009 | September 1980              |
| Manos del Uruguay<br>35 West 36th Street<br>New York, New York 10018                         | November 1980 <sup>*/</sup> |

\*/ Prior to November 1980, representation of this foreign principal was limited to activities exempt from registration under Section 3 of the Act.

ATTACHMENT NO. 3

10. In addition to those named in Items 8 and 9, if any, list the foreign principals who you continued to represent during the 6 month reporting period.

Ambassador of the Swiss Confederation  
Federation Suisse des Associations de Fabricants d'Horlogerie  
Embassy of the Government of Israel  
International Commodities Clearing House, Ltd.  
The London Commodity Exchange Company, Ltd.  
Union Nacional de Productores de Hortalizas  
British American Arts Association (U.K.)  
Dr. Dirk Alan Maxen-McIntire  
Ets. Beherman Demoen N.V./S.A., Engineering Division  
Corporation for Economic Development H.I. Ltd.  
Dutch Employers Federation  
Table Grape Growers Association

ATTACHMENT NO. 4

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9 and 10 of this statement?

Yes   X   No       

If yes, identify each such foreign principal and describe in full detail your activities and services:

British American Arts Association (U.K.)

One of the Registrant's employees serves as a member of the Steering Committee and Executive Committee of the principal, reviewed the principal's annual report, provided general information in response to inquiries on the services and activities of the principal, advised the principal about arts exchange programs and related developments in the United States and assisted the principal in opening a bank account and in screening job applicants.

Ets. Beherman Demoen N.V./S.A., Engineering Division

The Registrant represented the principal in negotiations for an agreement permitting the principal to market in Europe one product of a U.S. company.

Corporation for Economic Development H.I. Ltd.

The Registrant rendered advice on U.S. laws, regulations and policies and represented the principal in meetings with U.S. government officials concerning financing for a new rental housing program in the State of Israel. The Registrant also had discussions with private financial institutions, builders and architects in regard to the proposed housing program in the State of Israel. The Registrant also rendered advice on U.S. laws, regulations and policies in connection with proposed agricultural development and marketing projects in the United States. In addition, the Registrant rendered advice concerning a joint venture in the United States for development of a series of television programs.

Dutch Employers Federation

The Registrant rendered advice on U.S. laws, regulations, policies and legislation concerning state taxing

systems, and submitted testimony on behalf of the principal to the U. S. Senate Finance Subcommittee on Taxation and Debt Management during hearings on S. 1688.

Embassy of the Government of Israel

The Registrant rendered advice on U.S. laws, regulations and policies in connection with United States supply of oil. The Registrant also rendered advice on U.S. laws, regulations and policies concerning taxation.

Union Nacional de Productores de Hortalizas

The Registrant represented the West Mexico Vegetable Distributors Association in Southwest Florida Winter Vegetable Growers Ass'n v. United States (U.S. Court of International Trade).

Manos del Uruguay

The Registrant rendered advice on U.S. laws, regulations and policies and represented the principal in connection with pending petitions filed with the Office of the United States Trade Representative (Case Nos. 79-24, 79-31, 79-32) concerning GSP treatment for certain products. The Registrant also submitted written testimony on behalf of the principal, addressing the principal's petitions for GSP treatment, to the Senate Committee on Finance.

Government of Nicaragua

The Registrant rendered advice on U.S. laws, regulations and policies and represented the principal at meetings with U.S. government officials concerning extradition proceedings and financial assistance. The Registrant also rendered advice on U.S. laws, regulations and policies concerning recovery of assets of Nicaraguan nationals.

Government of Spain

The Registrant rendered advice on the status of bilateral agreements between the principal and the United States.

Ambassador of the Swiss Confederation

The Registrant rendered advice on U.S. laws, regulations and policies concerning imports, customs requirements, pending litigation in U.S. courts and agencies, antitrust and unlawful business practices law, treaty provisions on mutual assistance in criminal proceedings, treaty provisions on double taxation, extradition, inheritance, draft registration, taxation, criminal law, banking, commodities regulation, immigration, the legislative veto, and conflicts with Swiss secrecy laws. Further, the Registrant represented the principal in the cases In the Matter of the Petition of Josette Geisser, divorced Bauer and Josette Claire Bauer nee Geisser v. United States.

Federation Suisse des Associations de Fabricants d'Horlogerie

The Registrant rendered advice on U.S. laws, regulations and policies concerning U.S. trade policy, economic developments, customs requirements and watch imports.

International Commodities Clearing House, Ltd. and The London Commodity Exchange Company, Ltd.

The Registrant rendered advice on C.F.T.C. proposed Rule 21.03, other C.F.T.C. proposed and adopted rules relating to reporting requirements and foreign brokers and traders, and U.S. laws, regulations and policies relating to margin requirements. In addition, the Registrant assisted in preparation of comments filed in a rulemaking proceeding before the C.F.T.C. relating to Rule 21.03.

Table Grape Growers Association

The Registrant rendered advice on U.S. laws, regulations, policies and proposed legislation affecting imports of table grapes from Mexico.

ATTACHMENT NO. 5

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity as defined below?

Yes   X   No       

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

Government of Nicaragua

On behalf of the principal, the Registrant had discussions concerning extradition proceedings with Mike Kozak, Department of State Legal Advisor Office; Murray Stein, Department of Justice; Eugene Malmborg, Tom Ramsey, Mike Peay, and Mark Feldman, Department of State; and William Bowdler, Assistant Secretary of State. On behalf of the principal, the Registrant also had discussions concerning financial assistance with Gary Winter, A.I.D. attorney.

Manos del Uruguay

The Registrant submitted written testimony on behalf of the principal, addressing the principal's petitions for GSP treatment, to the Senate Committee on Finance.

Corporation for Economic Development H.I. Ltd.

On behalf of the principal, the Registrant had discussions concerning financing for a new rental housing program in the State of Israel with Steve Giddings, Housing Staff of A.I.D.; Douglas Bennet, Administrator of A.I.D.; Peter Kim, A.I.D.; and Michael Kitay, Staff A.I.D.

Dutch Employers Federation

On behalf of the principal, the Registrant prepared and submitted a statement to the U.S. Senate Finance Subcommittee on Taxation and Debt Management during hearings on S. 1688.



ATTACHMENT NO. 6

14.(a) RECEIPTS - MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise?

Yes   X   No       

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.

| <u>Date</u>   | <u>From Whom</u>       | <u>Purpose</u> | <u>Amount</u> |
|---|------------------------|----------------|---------------|
| <u>Ambassador of the Swiss Confederation</u>  |                        |                |               |
| 06/19/80  | Swiss Embassy          | Legal Fees     | \$ 11,250.00  |
| 06/19/80  | Swiss Embassy          | Disbursements  | 311.46        |
| 09/26/80  | Swiss Embassy          | Legal Fees     | 6,250.00      |
| 09/26/80  | Swiss Embassy          | Disbursements  | 289.30        |
| 11/07/80  | Swiss Embassy          | Legal Fees     | 800.00        |
| <u>Swiss Cheese Union, Inc. and Switzerland Gruyere Processed Cheese Manufacturers' Association</u> |                        |                |               |
| 08/29/80  | Swiss Cheese Union     | Legal Fees     | \$ 3,900.00   |
| 08/29/80  | Swiss Cheese Union     | Disbursements  | 209.84        |
| <u>Federation Suisse des Associations de Fabricants d'Horlogerie</u>                                |                        |                |               |
| 07/11/80  | Swiss Watch Federation | Legal Fees     | \$ 6,250.00   |
| 07/11/80  | Swiss Watch Federation | Disbursements  | 88.83         |
| 10/17/80  | Swiss Watch Federation | Legal Fees     | 6,250.00      |
| 10/17/80  | Swiss Watch Federation | Disbursements  | 43.05         |
| <u>Embassy of the Government of Israel</u>  |                        |                |               |
| 06/27/80  | State of Israel        | Legal Fees     | \$ 4,076.25   |
| 06/27/80  | State of Israel        | Disbursements  | 710.95        |
| 07/04/80  | State of Israel        | Legal Services | 20,000.00     |
| 07/04/80  | State of Israel        | Disbursements  | 1,074.90      |
| <u>London Commodity Exchange Co., Ltd. and International Commodities Clearing House, Ltd.</u>       |                        |                |               |
| 08/15/80  | London Commodity Exch. | Legal Fees     | \$ 4,296.57   |
| 08/15/80  | London Commodity Exch. | Disbursements  | 99.33         |

| <u>Date</u>  | <u>From Whom</u>                   | <u>Purpose</u> | <u>Amount</u> |
|--|------------------------------------|----------------|---------------|
| <u>Union Nacional de Productores de Hortalizas</u>         |                                    |                |               |
| 07/04/80   | West Mexico Vegetable Distributors | Legal Fees     | \$ 2,632.37   |
| 07/04/80   | West Mexico Vegetable Distributors | Disbursements  | 12,367.63     |
| 08/22/80   | West Mexico Vegetable Distributors | Legal Fees     | 1,850.00      |
| 08/22/80   | West Mexico Vegetable Distributors | Disbursements  | 17,038.46     |
| 10/31/80   | West Mexico Vegetable Distributors | Disbursements  | 12,459.12     |
| <u>Government of the Republic of Panama</u>                |                                    |                |               |
| 06/20/80   | Government of Panama               | Legal Fees     | \$ 27,112.20  |
| 06/20/80   | Government of Panama               | Disbursements  | 2,869.30      |
| <u>British American Arts Association (U.K.)</u>            |                                    |                |               |
| 09/26/80   | British Am. Art. Assoc..           | Disbursements  | \$ 622.10     |
| <u>Government of Nicaragua</u>                             |                                    |                |               |
| 06/27/80   | Government of Nicaragua            | Disbursements  | \$ 2.00       |
| 11/14/80   | Government of Nicaragua            | Disbursements  | 24,990.00     |
| <u>Est. Beherman Demoen N.V./S.A. Engineering Division</u> |                                    |                |               |
| 06/06/80   | Beherman                           | Disbursements  | \$ 44.00      |
| <u>Corporation for Economic Development H.I. Ltd.</u>      |                                    |                |               |
| 08/22/80   | Corp. for Econ. Develop.           | Legal Fees     | \$ 5,361.20   |
| 08/22/80   | Corp. for Econ. Develop.           | Disbursements  | 17,879.03     |
| 10/31/80   | Corp. for Econ. Develop.           | Legal Fees     | 16,934.00     |
| 10/31/80   | Corp. for Econ. Develop.           | Disbursements  | 8,066.00      |
| <u>Dutch Employers Federation</u>                          |                                    |                |               |
| 07/11/80   | Dutch Employers Fed.               | Legal Fees     | \$ 11,500.00  |
| 07/11/80   | Dutch Employers Fed.               | Disbursements  | 1,205.44      |
| 11/07/80   | Dutch Employers Fed.               | Legal Fees     | 4,500.00      |
| 11/07/80   | Dutch Employers Fed.               | Disbursements  | 419.90        |
| <u>Table Grape Growers Association</u>                     |                                    |                |               |
| 09/12/80   | Table Grape Growers Assoc.         | Legal Fees     | \$ 7,500.00   |
| TOTAL  |                                    |                | \$ 241,253.23 |

ATTACHMENT NO. 7

15.(a) DISBURSEMENTS - MONIES

During this 6 month reporting period, have you

- (1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement?

Yes   X   No       

- (2) transmitted monies to any such foreign principal?

Yes        No   X  

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

| <u>Date</u>                                  | <u>To Whom</u>       | <u>Purpose</u>       | <u>Amount</u> |
|--|----------------------|----------------------|---------------|
| <u>Ambassador of the Swiss Confederation</u> |                      |                      |               |
| Various                                      | Xerox Corporation    | Duplicating          | \$ 514.30     |
| Various                                      | C&P Telephone        | Telephone            | 40.49         |
| Various                                      | A&P Employees        | Local Transportation | 178.75        |
| Various                                      | A&P Employees        | Cash Expense         | 63.95         |
| 8/18/80                                      | B. Landau            | Travel Expense       | 404.25        |
| 8/18/80                                      | J. Umama             | Travel Expense       | 73.89         |
| 8/26/80                                      | L. Sunderland        | Cash Expense         | 1.00          |
| 9/26/80                                      | MacKenzie Associates | Outside Secretarial  | 27.50         |
| 10/27/80                                     | Sprint Packages      | Air Courier          | 71.50         |
|  |                      | Total                | \$ 1,375.63   |

Federation Suisse des Associations de Fabricants d'Horlogerie

|         |                          |                      |           |
|---------|--------------------------|----------------------|-----------|
| Various | Xerox Corporation        | Duplicating          | \$ 240.90 |
| Various | C&P Telephone            | Telephone            | 29.77     |
| Various | U.S. Postal Service      | Postage              | 56.33     |
| Various | A&P Employees            | Local Transportation | 21.75     |
| Various | RCA Global Communication | Telexes              | 60.40     |
| 8/18/80 | B. Landau                | Travel Expense       | 376.00    |
|         |                          | Total                | \$ 785.15 |

London Commodity Exchange Co., Ltd. and International  
Commodities Clearing House, Ltd.

|         |                          |                      |           |
|---------|--------------------------|----------------------|-----------|
| Various | Xerox Corporation        | Duplicating          | \$ 96.90  |
| Various | C&P Telephone            | Telephone            | 17.57     |
| Various | A&P Employees            | Local Transportation | 6.75      |
| Various | A&P Employees            | Cash Expense         | 9.40      |
| Various | U.S. Postal Service      | Postage              | 72.35     |
| Various | RCA Global Communication | Telexes              | 80.37     |
|         |                          | Total                | \$ 283.34 |

Embassy of the Government of Israel

|         |                          |                      |           |
|---------|--------------------------|----------------------|-----------|
| Various | C&P Telephone            | Telephone            | \$ 250.56 |
| Various | Xerox Corporation        | Duplicating          | 285.65    |
| Various | U.S. Postal Service      | Postage              | 12.15     |
| Various | A&P Employees            | Local Transportation | 51.18     |
| Various | A&P Employees            | Cash Expense         | 98.50     |
| Various | RCA Global Communication | Telexes              | 55.92     |
| 7/7/80  | S. Lang                  | Travel Expense       | 115.05    |
|         |                          | Total                | \$ 869.01 |

Union Nacional de Productores de Hortalizas

|          |                          |                      |             |
|----------|--------------------------|----------------------|-------------|
| Various  | Xerox Corporation        | Duplicating          | \$ 854.25   |
| Various  | C&P Telephone            | Telephone            | 125.01      |
| Various  | U.S. Postal Service      | Postage              | 5.65        |
| Various  | A&P Employees            | Local Transportation | 53.00       |
| Various  | A&P Employees            | Cash Expense         | 16.00       |
| Various  | Florida Clipping Service | Clipping Service     | 207.00      |
| Various  | Western Union            | Telegrams            | 35.43       |
| Various  | Charles R. Mann          | Professional Service | 49,976.47   |
| Various  | Informatics, Inc.        | Professional Service | 1,242.22    |
| 11/26/80 | Invictus Publication     | Publication          | 50.00       |
|          |                          | Total                | \$52,565.03 |

Government of Panama

|         |                     |                      |          |
|---------|---------------------|----------------------|----------|
| Various | C&P Telephone       | Telephone            | \$ 1.46  |
| Various | A&P Employees       | Local Transportation | 8.10     |
| 6/30/80 | U.S. Postal Service | Postage              | .15      |
| 8/20/80 | A&P Employee        | Cash Expense         | 9.00     |
|         |                     | Total                | \$ 18.71 |

British American Arts Assoc., U.K.

|         |                     |                      |          |
|---------|---------------------|----------------------|----------|
| Various | Xerox Corporation   | Duplicating          | \$ 9.84  |
| Various | U.S. Postal Service | Postage              | 37.14    |
| Various | C&P Telephone       | Telephone            | 9.46     |
| Various | A&P Employees       | Local Transportation | 7.50     |
| Various | A&P Employees       | Cash Expense         | 34.46    |
|         |                     | Total                | \$ 98.40 |

Beherman Demoen N.V./S.A.

|         |                          |                      |             |
|---------|--------------------------|----------------------|-------------|
| Various | Xerox Corporation        | Duplicating          | \$ 50.15    |
| Various | C&P Telephone            | Telephone            | 1,118.53    |
| Various | A&P Employees            | Local Transportation | 58.70       |
| Various | A&P Employees            | Cash Expense         | 195.75      |
| Various | RCA Global Communication | Telexes              | 254.20      |
| Various | Western Union            | Telegrams            | 240.00      |
| Various | W. D. Rogers             | Travel Expense       | 134.71      |
|         |                          | Total                | \$ 2,052.04 |

Corporation for Economic Development H.I. Ltd.

|          |                          |                      |             |
|----------|--------------------------|----------------------|-------------|
| Various  | Xerox Corporation        | Duplicating          | \$ 459.50   |
| Various  | C&P Telephone            | Telephone            | 1,745.29    |
| Various  | U.S. Postage Service     | Postage              | 7.36        |
| Various  | A&P Employees            | Cash Expense         | 64.00       |
| Various  | A&P Employees            | Local Transportation | 135.35      |
| Various  | RCA Global Communication | Telexes              | 1,237.70    |
| Various  | Western Union            | Telegrams            | 13.39       |
| Various  | J. W. Jones              | Travel Expense       | 2,280.80    |
| Various  | P. S. Berger             | Travel Expense       | 441.71      |
| Various  | M. P. Curzan             | Travel Expense       | 4,283.00    |
| 6/13/80  | E. Thom                  | Professional Service | 300.00      |
| 10/23/80 | J. H. Edmonson           | Professional Service | 4,005.05    |
| Various  | U.S. Corp. Co.           | Professional Service | 617.50      |
|          |                          | Total                | \$15,590.65 |

Dutch Employers Federation

|         |                     |                      |           |
|---------|---------------------|----------------------|-----------|
| Various | Xerox Corporation   | Duplicating          | \$ 290.40 |
| Various | C&P Telephone       | Telephone            | 56.80     |
| Various | U.S. Postal Service | Postage              | 49.31     |
| Various | A&P Employees       | Cash Expense         | 5.50      |
| Various | A&P Employees       | Local Transportation | 11.75     |
|         |                     | Total                | \$ 413.76 |

Table Grape Growers Association

|         |                          |                      |           |
|---------|--------------------------|----------------------|-----------|
| Various | Xerox Corporation        | Duplicating          | \$ 19.50  |
| Various | C&P Telephone            | Telephone            | 15.90     |
| Various | A&P Employees            | Local Transportation | 6.40      |
| Various | A&P Employees            | Cash Expense         | 186.73    |
| Various | Western Union            | Telegram             | 19.95     |
| Various | RCA Global Communication | Telexes              | 102.55    |
| 6/24/80 | Federal Express          | Air Courier          | 33.50     |
| 7/16/80 | J. Jackson               | Professional Service | 160.00    |
| 8/26/80 | L. Sunderland            | Cash Expense         | .20       |
|         |                          | Total                | \$ 544.73 |

Dr. Dirk Alan Maxen-McIntire

|         |                     |         |         |
|---------|---------------------|---------|---------|
| 6/30/80 | U.S. Postal Service | Postage | \$ 3.06 |
|         |                     | Total   | \$ 3.06 |

Government of Nicaragua

|          |                     |                      |             |
|----------|---------------------|----------------------|-------------|
| Various  | Xerox Corporation   | Duplicating          | \$ 1,777.25 |
| Various  | C&P Telephone       | Telephone            | 278.99      |
| 10/23/80 | U.S. Postal Service | Postage              | 1.24        |
| Various  | A&P Employees       | Cash Expense         | 353.90      |
| Various  | A&P Employees       | Local Transportation | 515.85      |
| 8/21/80  | Western Union       | Telegram             | 69.75       |

Government of Nicaragua (cont.)

|          |                           |                      |             |
|----------|---------------------------|----------------------|-------------|
| Various  | RCA Global Communication  | Telexes              | 105.34      |
| 6/2/80   | Orbis Books               | Publication          | 5.75        |
| 10/23/80 | P. Reichler               | Travel Expense       | 198.80      |
| Various  | Columbia Language Service | Professional Service | 16,112.57   |
| 10/16/80 | S. P. Martin              | Professional Service | 1,078.15    |
|          |                           | Total                | \$20,497.59 |

Lawrence Sunderland (Consultant Services to Foreign  
Principals and Registrant's Other Clients)

|         |                     |                       |              |
|---------|---------------------|-----------------------|--------------|
| 6/2/80  | Lawrence Sunderland | Professional Services | \$ 2,083.33  |
| 6/13/80 | Lawrence Sunderland | Professional Services | 7,500.00     |
| 6/13/80 | Lawrence Sunderland | Professional Services | 533.34       |
| 8/5/80  | Lawrence Sunderland | Professional Services | 2,350.00     |
| 8/11/80 | Lawrence Sunderland | Professional Services | 2,350.00     |
| 8/26/80 | Lawrence Sunderland | Expense reimbursement | 47.62        |
| 9/2/80  | Lawrence Sunderland | Professional Services | 2,350.00     |
| 10/1/80 | Lawrence Sunderland | Professional Services | 2,350.00     |
| 11/3/80 | Lawrence Sunderland | Professional Services | 2,350.00     |
| 12/1/80 | Lawrence Sunderland | Professional Services | 2,350.00     |
| 12/1/80 | Lawrence Sunderland | Expense Reimbursement | 105.47       |
| 12/3/80 | Lawrence Sunderland | Professional Services | 800.01       |
|         |                     | Total                 | \$ 25,169.77 |

Manos del Uruguay

|          |                   |                      |              |
|----------|-------------------|----------------------|--------------|
| Various  | C&P Telephone     | Telephone            | \$ 10.39     |
| Various  | Xerox Corporation | Duplicating          | 7.50         |
| 11/20/80 | A&P Employee      | Local Transportation | 4.70         |
|          |                   | Total                | \$ 22.59     |
|          |                   | TOTAL                | \$120,289.46 |

ATTACHMENT NO. 8

15.(c) DISBURSEMENTS - POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes \_\_\_\_\_ No   X   <sup>\*/</sup>

\*/ However, the following persons who have filed Short-Form Registration Statements have made political contributions:

| <u>Date</u>                 | <u>Amount or Thing<br/>of Value</u> | <u>Name of<br/>Political Organization</u> | <u>Name of<br/>Candidate</u>      |
|-----------------------------|-------------------------------------|---|-----------------------------------|
| <u>James A. Beat</u>        |                                     |   |                                   |
| 10/9/80                     | \$50                                | Americans Concerned for the<br>Judiciary  | In Opposition<br>to Ronald Reagan |
| <u>Alexander E. Bennett</u> |                                     |   |                                   |
| 9/26/80                     | \$50                                | McGovern Campaign Committee               | George McGovern                   |
| 9/27/80                     | \$10                                | Democratic Victory Fund (DC)              | Various                           |
| <u>Paul S. Berger</u>       |                                     |   |                                   |
| 6/11/80                     | \$100                               | People for Al Ullman                      | Al Ullman                         |
| <u>Paul C. Besozzi</u>      |                                     |   |                                   |
| 8/14/80                     | \$25                                | Pierce O'Donnell for Congress             | Pierce O'Donnell                  |
| 9/13/80                     | \$25                                | Mike Barnes for Congress                  | Michael Barnes                    |
| <u>Myron P. Curzan</u>      |                                     |   |                                   |
| 6/1/80                      | \$100                               | Mike Barnes for Congress                  | Michael Barnes                    |
| <u>James Fitzpatrick</u>    |                                     |   |                                   |
| 10/6/80                     | \$100                               | Mike Barnes for Congress                  | Michael Barnes                    |

| <u>Date</u>                 | <u>Amount or Thing<br/>of Value</u> | <u>Name of<br/>Political Organization</u>    | <u>Name of<br/>Candidate</u> |
|-----------------------------|-------------------------------------|--|------------------------------|
| <u>Marc D. Guren</u>        |                                     |  |                              |
| 9/29/80                     | \$50                                | National Unity Campaign<br>for John Anderson | John Anderson                |
| 9/29/80                     | \$30                                | Handgun Control, Inc. PAC                    | Various                      |
| <u>David Hird</u>           |                                     |  |                              |
| 8/20/80                     | \$25                                | National Unity Campaign<br>for John Anderson | John Anderson                |
| <u>Robert B. Hummel</u>     |                                     |  |                              |
| 10/20/80                    | \$50                                | Mike Barnes for Congress                     | Michael Barnes               |
| <u>David R. Kentoff</u>     |                                     |  |                              |
| 10/3/80                     | \$75                                | Mike Barnes for Congress                     | Michael Barnes               |
| <u>Brooksley E. Landau</u>  |                                     |  |                              |
| 6/6/80                      | \$50                                | Mark Green for Congress<br>Committee         | Mark Green                   |
| <u>Daniel M. Lewis</u>      |                                     |  |                              |
| 10/6/80                     | \$100                               | Mike Barnes for Congress                     | Michael Barnes               |
| 10/20/80                    | \$50                                | DNC Presidential Fund                        | Jimmy Carter                 |
| <u>Steven P. Lockman</u>    |                                     |  |                              |
| 10/80                       | \$50                                | Mike Barnes for Congress                     | Michael Barnes               |
| <u>Lauralee A. Matthews</u> |                                     |  |                              |
| 7/3/80                      | \$25                                | Pierce O'Donnell for Congress                | Pierce O'Donnell             |
| 9/2/80                      | \$100                               | Mike Barnes for Congress                     | Michael Barnes               |
| 11/20/80                    | \$20                                | Nels Ackerson for Congress                   | Nels Ackerson                |
| <u>John M. Quinn</u>        |                                     |  |                              |
| 9/15/80                     | \$100                               | McGovern for Senate Committee                | George McGovern              |



| <u>Date</u>                  | <u>Amount or Thing<br/>of Value</u> | <u>Name of<br/>Political Organization</u>       | <u>Name of<br/>Candidate</u> |
|------------------------------|-------------------------------------|---|------------------------------|
| <u>William D. Rogers</u>     |                                     |   |                              |
| 6/20/80                      | \$100                               | Anderson for President<br>Committee             | John Anderson                |
| 8/25/80                      | \$25                                | Joseph Fisher for Congress<br>Committee         | Joseph Fisher                |
| 9/15/80                      | \$100                               | Democratic Congressional<br>Campaign Committee  | Various                      |
| 10/1/80                      | \$50                                | Joseph Fisher for Congress<br>Committee         | Joseph Fisher                |
| 10/1/80                      | \$50                                | Margaret Heckler for<br>Congress Committee      | Margaret Heckler             |
| <u>Lawrence A. Schneider</u> |                                     |   |                              |
| 7/14/80                      | \$15                                | Mike Barnes for Congress                        | Michael Barnes               |
| 7/22/80                      | \$25                                | Women's Campaign Fund                           | Various                      |
| 8/7/80                       | \$15                                | Culver Citizens Committee                       | John Culver                  |
| 9/6/80                       | \$41.11                             | Kathleen O'Reilly Campaign                      | Kathleen O'Reilly            |
| 9/12/80                      | \$20                                | Pierce O'Donnell for Congress                   | Pierce O'Donnell             |
| 10/7/80                      | \$100                               | Mike Barnes for Congress                        | Michael Barnes               |
| 10/23/80                     | \$4                                 | Montgomery County Central<br>Committee          | Various                      |
| <u>Mark Spooner</u>          |                                     |   |                              |
| 9/80                         | \$100                               | Pace for Arlington County<br>Board              | Sim Pace                     |
| <u>Lawrence Sunderland</u>   |                                     |   |                              |
| 9/14/80                      | \$25                                | National Committee for an<br>Effective Congress | Various                      |
| 9/14/80                      | \$50                                | Marylanders for Mathias                         | Charles McC.<br>Mathias      |

UNITED STATES DEPARTMENT OF JUSTICE  
REGISTRATION UNIT  
CRIMINAL DIVISION  
WASHINGTON, D. C. 20530

NOTICE

Please answer the following questions and return this sheet in triplicate with your supplemental statement:

1. Is your answer to Item 16 of Section V (Political Propaganda - page 7 of Form OBD-64 - Supplemental Statement):

Yes X or No                     

(If your answer to question 1 is "yes" do not answer question 2 of this form.)

2. Do you disseminate any material in connection with your registration:

Yes                      or No                     

(If your answer to question 2 is "yes" please forward for our review copies of all such material including: films, film catalogs, posters, brochures, press releases, etc. which you have disseminated during the past six months.)

Brooksley E. Landau  
Signature

January 5, 1981  
Date

Brooksley E. Landau  
Please type or print name of  
signatory on the line above

Partner  
Title